

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER LEE WOOD,

Defendant.

NO. MJ18-288

**DISCOVERY PROTECTIVE ORDER**

This matter, having come to the Court's attention on the Stipulation for Entry of a Discovery Protective Order submitted by the United States of America and Defendant Christopher Lee Wood, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Protected Material

The following documents and materials are deemed Protected Material. The United States will make available copies of the Protected Materials, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Materials is limited to the attorneys of record, and investigators, paralegals, law clerks, experts, and assistants for the attorneys of record (hereinafter collectively referred to as members of the defense team). This category of Protected Materials will be marked and labeled as "Protected Material":

- 1                   a.     Grand Jury transcripts and exhibits.
- 2                   b.     Victim/Witness statements, including but not limited to reports of
- 3 law enforcement officers memorializing witness/victim statements, audio/video
- 4 recordings of interviews of victims and witnesses, and anti-harassment or protection
- 5 order hearings and applications.
- 6                   c.     Records, reports, and documents related to medical visits and
- 7 examinations, children's advocacy centers and agencies, Child Protective Services, and
- 8 schools.
- 9                   d.     The personal information related to victim/witnesses, and any
- 10 statements and documents containing personal information about or related to any
- 11 victims and witnesses provided by the government in discovery is deemed Protected
- 12 Material. As used in this Order, the term "personal information" refers to each victim
- 13 and witness's full name, date of birth, Social Security number (or other identification
- 14 information), driver's license number, address, telephone number, location of residence
- 15 or employment, school records, juvenile criminal records, and other confidential
- 16 information.

17       2.     Scope of Review of Protected Material

18       Defense attorneys of record and members of the defense team may display and

19 review the Protected Material with the Defendant. The attorneys of record and members

20 of the defense team acknowledge that providing copies of the Protected Material to the

21 Defendant and other persons is prohibited, and agree not to duplicate or provide copies of

22 Protected Material to the Defendant and other persons.

23       3.     Consent to Terms of Protective Order

24       Members of the defense team shall provide written consent and acknowledgement

25 that they will each be bound by the terms and conditions of this Protective Order. The

26 written consent need not be disclosed or produced to the United States unless requested

27 by the Assistant United States Attorney and ordered by the Court.

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1           4.     Parties' Reciprocal Discovery Obligations

2           Nothing in this order should be construed as imposing any discovery obligations  
3 on the government or the defendant that are different from those imposed by case law and  
4 Rule 16 of the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

5           5.     Filing of Protected Material

6           Any Protected Material that is filed with the Court in connection with pre-trial  
7 motions, trial, sentencing, or other matter before this Court, shall be filed under seal and  
8 shall remain sealed until otherwise ordered by this Court. This does not entitle either  
9 party to seal their filings as a matter of course. The parties are required to comply in all  
10 respects to the relevant local and federal rules of criminal procedure pertaining to the  
11 sealing of court documents.

12          6.     Non-termination

13          The provisions of this Order shall not terminate at the conclusion of this  
14 prosecution.

15          7.     Violation of Protective Order

16          Any violation of any term or condition of this Order by the Defendants, their  
17 attorney(s) of record, or any member of the defense team may be held in contempt of  
18 court, and/or may be subject to monetary or other sanctions as deemed appropriate by this  
19 Court.

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1 If a Defendant violates any term or condition of this Order, the United States  
2 reserves its right to seek a sentencing enhancement for obstruction of justice, or to file  
3 any criminal charges relating to any Defendant's violation.

4 DATED this 27 day of July, 2018.

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7 MARY ALICE THEILER  
8 United States Magistrate Judge

9 Presented by:

10  
11 /s/ Cecelia Y. Gregson

12 CECELIA Y. GREGSON

13 /s/ Nancy Tenney

14 NANCY TENNEY  
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